

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 6

1445 Ross Avenue, Suite 1200

Dallas, Texas 75202-2733

ACKNOWLEDGEMENT AND RECORD OF SPCC INSPECTION/PLAN REVIEW

SPCC CASE #: FY-INSP-990277-A

FRP ID: FRP-06-LA-00556

DATE: 08/16/1999

Inspector Name: Don Kluth EPA Region: 06

Inspection Team Members Tami Engle

Name of Facility: Laterre #4

Latitude: 0 0 0

Longitude: 0 0 0

Source:

Accuracy: %

Facility Address:

City: County/Parish: Terrebonne State: LA Zip:

Facility Contact: Title: Environmental Manager

Telephone Number: (504) 857-9215

Name of Owner/Operator: Denbury Resources, Inc.

Corporate Address: 2503 Petroleum Drive

City: Houma State: LA Zip: 70363

Corporate Contact: George Pecorino Title: District Operations

Telephone Number:

Synopsis of Business: Offshore oil production

How many employees at this facility:

If unmanned, number of employees at this Facility:

Sic Code: 1311

Route of Entry
to Waterway:

Distance to Navigable Waterway:(in feet)

Relative Position:

Elevation above water body (ft.):

Acknowledgement of Inspection:

Company Contact:

Title:

EPA/START Inspector

Title:

9527309



Memorandum of Understanding (check all applicable descriptions):☒ Non-Transportation Related☒ Transportation Related☒ EPA☐ MMS☒ USCG☐ OPS☐ Onshore☒ Offshore☐ Drilling☒ Production☐ Refining☐ In plant processing☐ Waste Treatment☒ Storage☐ Commercial☐ Agriculture☐ Industrial☐ Public☐ Load/Unloading Racks☐ In-Facility pipelines☐ Drilling☐ Production☐ Storage☐ Over Water Transfer
(loading arms, pipes at
Terminal)☐ Oily ballast tanks☐ Tank washings from
vessels☐ Inline/Breakout Tanks:
injected/reinjected for
continuous pipeline
operation**SPCC Part 112.1(b)**☐ Drilling☐ Processing☐ Consuming oil/oil products☒ Producing☐ Refining☒ Gathering☒ Transferring☒ Storing☐ Distributing**Facility Type:**☒ Oil/Gas Production☐ Petroleum Distributor☐ Bulk Storage☐ Refinery /
Petrochemical☐ Utilities☐ Gas Station/Convenience☐ Auto Dealership☐ Federal (Non-Military)☐ Federal (Military)☐ Trucking/Transport☐ Industrial☐ Local Government☐ Aviation☐ Farm☐ Trustee/Native American☐ Commercial☐ State Government☐ Contractor☐ Railroad☐ Other:

Other: _____

Does the Facility conform to any of the following industry standards (check all that apply)?☐ API-620 Design and
Construction of Large,
Welded, Low-Pressure
Storage Tanks☐ API-650 Welded Steel
Tanks for Oil Storage☐ API-653 Tank Inspection
Repair, Alteration, and
Construction☐ API-2610 Design
Construction, Operation
Maintenance, and
Inspection of Terminal
and Tank Facilities☐ UL-142 Steel Above-
ground Tanks for
Flammable and
Combustible Liquids☐ None☐ Other Standard(s)

List Standard(s) of facility: _____

Facility Startup Date: _____	SPCC Plan Required Date: _____
AST Storage Capacity(gal): _____	UST Storage Capacity(gal): _____
Annual Oil throughput(gal): _____	Production Rates(gal): _____
SPCC Plan prepared: <input checked="" type="radio"/> YES <input type="radio"/> NO	SPCC Plan available for review: <input checked="" type="radio"/> YES <input type="radio"/> NO
SPCC Plan available (during a normal 8 hr day): <input checked="" type="radio"/> YES <input type="radio"/> NO	SPCC Plan maintained on site: <input type="radio"/> YES <input checked="" type="radio"/> NO
Facility is: <input type="radio"/> Unattended <input checked="" type="radio"/> Attended (<input type="radio"/> Daily (8 hrs) <input type="radio"/> Daily (24 hrs) <input type="radio"/> Periodically)	
SPCC Plan Certified: <input checked="" type="radio"/> YES <input type="radio"/> NO	Date of Certification: _____
Name of Professional Engineer: <u>Kerry Redman</u>	
License Number: <u>22701</u>	State: <u>LA</u>
SPCC Plan reviewed every three years? <input checked="" type="radio"/> YES <input type="radio"/> NO SPCC Plan review sign-off? <input checked="" type="radio"/> YES <input type="radio"/> NO	
Is there a secondary containment? <input checked="" type="radio"/> YES <input type="radio"/> NO	
Does the SPCC Plan indicate that management has approved the plan? <input checked="" type="radio"/> YES <input type="radio"/> NO	
Mgmt Personnel Name: <u>George Pecorino</u>	
Mgmt Personnel Title: <u>District Operations Manager</u>	
Have there been any prior releases at this facility? <input type="radio"/> YES <input checked="" type="radio"/> NO If YES, provide date(s), spill size(gal), and source of information: Date: _____ Spill size (gal): _____ Info. Source: _____ Date: _____ Spill size (gal): _____ Info. Source: _____ Date: _____ Spill size (gal): _____ Info. Source: _____	
Have there been reportable spills at this Facility per 40 CFR part 110? <input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	
Has the Facility had a spill of more than 1,000 gallons in the past 12 months? <input type="radio"/> YES <input checked="" type="radio"/> NO	
If YES, provide: Date of Spill: _____ Was Plan submitted per 40 CFR 112.4? <input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	
Has the Facility had two spills of a harmful quantity in the past 12 months? <input type="radio"/> YES <input checked="" type="radio"/> NO	
If YES, provide: Date of Spill: _____ Was Plan submitted per 40 CFR 112.4? <input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	
Has there been any change of facility design, construction, operation, or maintenance which could affect the facility's potential for discharge? <input type="radio"/> YES <input checked="" type="radio"/> NO If YES, describe: 	
Date of Latest Change: _____ Plan Amended by PE: _____	

	Plan Review	Field Inspection
GENERAL TOPICS 112.7(b), (c), (d)		
Plan includes a prediction of equipment failure(s) which could result in a discharge from the facility per 40 CFR 112.7(b)	<input checked="" type="radio"/> YES <input type="radio"/> NO	
Plan discusses appropriate containment and/or diversionary structures equipment per 40 CFR 112.7(c) Note: Production Facility (i.e. process vessel)	<input checked="" type="radio"/> YES <input type="radio"/> NO	
Installation of structures or equipment listed in 112.7(c) was determined to be impracticable	<input type="radio"/> YES <input checked="" type="radio"/> NO	
If YES, impracticability clearly demonstrated	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	
If YES, contingency plan per 40 CFR109 provided	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	
If YES, written commitment of manpower provided	<input checked="" type="radio"/> YES <input checked="" type="radio"/> NO	
General Notes/Comments:		
INSPECTIONS AND RECORDS 112.7 (e)(8)		
a. Inspections required by 40 CFR 112 are in accordance with written procedures developed for the Facility.	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input checked="" type="radio"/> Adeq <input checked="" type="radio"/> Inad <input checked="" type="radio"/> N/A
b. Written procedures and a record of inspections are signed by the appropriate supervisor or inspector.	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input checked="" type="radio"/> Adeq <input checked="" type="radio"/> Inad <input checked="" type="radio"/> N/A
c. Written procedures and a record of inspections are made part of the SPCC Plan.	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input checked="" type="radio"/> Adeq <input checked="" type="radio"/> Inad <input checked="" type="radio"/> N/A
d. Written procedures and a record of inspections are maintained for a period of three (3) years.	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input checked="" type="radio"/> Adeq <input checked="" type="radio"/> Inad <input checked="" type="radio"/> N/A
General Notes/Comments: -No discussion of length of time inspection records maintained		

	Plan Review	Field Inspection
PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES 112.7 (e)(10)		
a. Training on the operation and maintenance of equipment to prevent the discharge of oil and applicable pollution control laws, rules, & regulations.	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
b. Designated person accountable for spill prevention	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
c. Spill prevention briefings scheduled periodically	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
Comments based on inspection:		
OIL DRILLING PRODUCTION OR WORKOVER FACILITIES, OFFSHORE 112.7 (e)(7) Note: See Tank and Secondary Containment Forms.		
a. Oil drainage collection equipment utilized?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Drains controlled/directed to central collection?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
b. Sump sytem, if used, adequately sized?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Spare pump/equivalent method available?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Regularly scheduled preventive maintenance program to assure reliable operations of the liquid removal system and pump start-up device?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
c. Separators/treaters equipped with dump valves?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Measures in place should dump valve fail?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
d. Atmospeheric storage/surge tanks equipped with high level sensing devices?	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
e. Pressure tanks equipped with high and low pressure sensing devices?	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
f. Tanks have corrosion protection measures?	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
g. Written procedure for inspecting and testing pollution prevention equipment and systems prepared?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A

	Plan Review	Field Inspection
- Written procedure maintained at the Facility?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Written procedure included in the SPCC Plan?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Inspections and tests conducted periodically?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Daily, or	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Weekly? or	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Monthly, or	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Annual, or	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Other frequency?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
h. Surface and subsurface well shut-in valves and devices are sufficiently described?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Detailed records for each well maintained?	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
i. Blowout preventer (BOP) assembly installed and utilized in accordance with state regulatory agency requirements?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
j. Well control measures provided in the event of emergency conditions?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
k. Written instructions are prepared for contractors and subcontractors by the owner or operator?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Such instructions are maintained at the Facility?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
l. Manifolds are equipped with check valves?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
m. Flowlines are equipped with high pressure sensing device and shut-in valve at the wellhead?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- If NO, is a pressure relief system provided?	<input type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
n. Pipelines have corrosion protection?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A

	Plan Review	Field Inspection
o. Sub-marine pipelines are Stress Protected?	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Sub-marine pipelines are inspected periodically?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Daily, or	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Weekly, or	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Monthly, or	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Frequency Annual, or	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Other frequency?	<input type="radio"/> YES <input checked="" type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
- Inspections are documented and maintained?	<input checked="" type="radio"/> YES <input type="radio"/> NO	<input type="radio"/> Adeq <input type="radio"/> Inad <input type="radio"/> N/A
Comments based on inspection: -No discussion of whether tanks are atmospheric or pressurized and sensing devices, if any, present. No discussion of corrosion protection. No discussion of whether detailed records are kept for each well.		